



**Commonwealth Edison**  
 1400 Opus Place  
 Downers Grove, Illinois 60515

December 19, 1990

Dr. Thomas E. Murley  
 Office of Nuclear Reactor Regulation  
 U.S. Nuclear Regulatory Commission  
 Washington, DC 20555

Subject: Dresden Station Units 2 and 3  
 Quad-Cities Station Units 1 and 2  
 Zion Station Units 1 and 2  
 LaSalle County Station Units 1 and 2  
 Byron Station Units 1 and 2  
 Braidwood Station Units 1 and 2  
 Fitness-for-Duty Certification  
 NRC Docket Nos. 50-237/249, 50-254/265,  
50-295/304, 50-373/374, 50-454/455 & 50-456/457

Reference: (a) Nuclear Regulatory Commission 10 CFR Part 26,  
 Fitness-for-Duty Programs.  
 (b) January 3, 1990, C. Reed letter to T.E. Murley

Dear Murley:

Reference (a) required each licensee to certify that it had implemented a fitness for duty program that met the requirements of 10 CFR Part 26. It also required the licensee to describe any cutoff levels more stringent than those mandated by the rule. In reference (b) Commonwealth Edison (CECo) took one exception to the cutoff limits specified in 10 CFR 26 and CECo also included benzodiazepines in the panel of drugs to be tested for under subpart A 1.1(2). These exceptions were as follows:

<u>CHEMICAL</u>	<u>INITIAL TEST CUTOFF LEVEL</u>	<u>CONFIRMATORY TEST CUTOFF LEVEL</u>
Cannabinoids	20 ng/ml	Same as Rule
Benzodiazepines	300 ng/ml	50 ng/ml

CECo has conducted pre-employment and "For Cause" drug testing since 1972. Our cut-off level of 20 ng/ml for marijuana metabolites has been in effect since 1984. A survey of other utilities indicated that CECo was virtually the only utility still utilizing that cut-off level.

CECo understands that DHHS is strongly considering a move to reduce the THC cut-off level from 100 ng/ml to 50 ng/ml. During the first six months of 1990, 13% of the marijuana positives screened were between 20 ng/ml and 49 ng/ml. We conclude that increasing our cut-off level from 20 ng/ml to 50 ng/ml would not have a significant detrimental impact on our effort to maintain a drug free workplace.

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After seeking the advice of outside consultants, CECO added benzodiazepines to its FFD drug test panel prior to the actual implementation of 10 CFR 26. In the ten months of benzodiazepine testing experience (18,908 tests), numerous positive tests have been reviewed and evaluated by the Medical Review Officer. In only two cases was there a question of substance abuse. In each of these cases, the matter was resolved by medical reports and additional medical information. Based upon the Medical Review Officer's recommendation, CECO concludes that benzodiazepine testing may be discontinued without impairing the overall efficiency and benefit of the Fitness For Duty Program.

In accordance with 10 CFR 26 Subpart A 1.1.(2) CECO is modifying the cutoff level for marijuana metabolites to 50 ng/ml and eliminating benzodiazepines from the panel of drugs tested under the Fitness For Duty Program.

If there are any questions, please direct them to this office.



Allen R. Checca  
Nuclear Licensing Administrator

cc: A.B. Davis - Regional Administrator RIII  
Resident Inspector - Dresden  
Resident Inspector - Quad Cities  
Resident Inspector - Zion  
Resident Inspector - LaSalle  
Resident Inspector - Byron  
Resident Inspector - Braidwood  
J. Craig - Project Director - NRR